

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
<b>v.</b>	:	<b>DATE FILED:</b> _____
	:	
<b>CLIFTON CARTER</b>	:	<b>VIOLATION: 18 U.S.C. § 1344</b>
	:	<b>(bank fraud - 4 counts)</b>
	:	<b>Notice of additional factors</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Sovereign Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. From on or about March 11, 2002, through on or about March 12, 2002, in the Eastern District of Pennsylvania, defendant

**CLIFTON CARTER**

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

**THE SCHEME**

It was part of the scheme that from on or about March 11, 2002, through on or about March 12, 2002:

3. Defendant CLIFTON CARTER possessed a false identification document for the purpose of using it for identification to cash counterfeit checks.

4. Defendant CLIFTON CARTER, while posing as a man identified here by the initials "J.P.," cashed four counterfeit checks totaling approximately \$7,102.80 at various branches of Sovereign Bank, each counterfeit check having been made payable to J.P.

In violation of Title 18, United States Code, Section 1344.

## **COUNT TWO**

### **THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Madison Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.

2. From on or about May 1, 2002, through on or about May 6, 2002, in the Eastern District of Pennsylvania, defendant

### **CLIFTON CARTER**

knowingly executed and attempted to execute a scheme to defraud Madison Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

### **THE SCHEME**

It was part of the scheme that on or about May 1, 2002, through on or about May 6, 2002:

3. Defendant CLIFTON CARTER possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.

4. Defendant CLIFTON CARTER, while posing as a man identified here as "T.C.," cashed three counterfeit checks totaling approximately \$4,860.05 at various branches of Madison Bank, each counterfeit checked having been made payable to T.C.

In violation of Title 18, United States Code, Section 1344.

### **COUNT THREE**

#### **THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Beneficial Savings Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.

2. On or about May 2, 2002, in the Eastern District of Pennsylvania, defendant

#### **CLIFTON CARTER**

knowingly executed and attempted to execute a scheme to defraud Beneficial Savings Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

#### **THE SCHEME**

It was part of the scheme on or about May 2, 2002:

3. Defendant CLIFTON CARTER possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.

4. Defendant CLIFTON CARTER, while again posing as a man identified here by the initials "T.C.," cashed two counterfeit checks totaling approximately \$3,707.50 at various branches of Beneficial Savings Bank, each counterfeit check having been made payable to T.C.

In violation of Title 18, United States Code, Section 1344.

## **COUNT FOUR**

### **THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Sovereign Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.
2. From on or about May 23, 2002, through on or about May 31, 2002, in the Eastern District of Pennsylvania, defendant

### **CLIFTON CARTER**

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

### **THE SCHEME**

It was part of the scheme that from on or about May 23, 2002, through on or about May 31, 2002:

3. Defendant CLIFTON CARTER possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.
4. Defendant CLIFTON CARTER, while posing as a man identified here by the initials "B.C.," cashed four counterfeit checks totaling approximately \$6,889.20 at various branches of Sovereign Bank, each counterfeit check having been made payable to B.C.

In violation of Title 18, United States Code, Section 1344.

**NOTICE OF ADDITIONAL FACTORS**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. In committing the offenses charged in Counts One through Four of this indictment, defendant

**CLIFTON CARTER**

a. committed offenses in which the intended loss exceeded \$10,000 as described in U.S.S.G. § 2B1.1(b)(1)(C).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**